approximately 10 cents per kWh. With average rates of 7.77 cents per kWh for residential service, 6.15 cents per kWh for commercial service, and 4.63 cents per kWh for industrial service, an additional 10 cents per kWh would increase residential rates by 128.7%, commercial rates by 162.6%, and industrial rates by 215.98%. The average bill of a residential customer using 1,000 kWh per month would increase from \$77.70 to \$177.70 per month.

Using a similar methodology, the Public Staff estimated that it would require over 237,000,000 man-hours to convert all the overhead distribution lines of the Utilities to underground. In other words, assuming that the workers currently employed by the Utilities to bury power lines continued working on new undergrounding projects, and that the Utilities collectively hired nearly 5,000 new employees to bury existing power lines, it would take 25 years to complete the task.

For a perspective on the impact of lesser levels of investment in underground facilities, Table 7 shows the average bill increases for residential customers using 1,000 kWh per month and an average bill of \$77.70 associated with levels of investment ranging from \$1 billion to \$40.8 billion.